

EXHIBIT C Plaintiff's Supplemental Motion to Include Guin Mundorf, LLC School Law Email Records in the Court Record

Constitutional, Statutory, and Case Law Implications of School District and Counsel Misconduct

Email Dated April 15, 2025 – Subject: **Official Board Minutes Confirm Retaliatory Ban and Misuse of School Law – CUSD #10 (Attachment Included)**

Case No 25-CV-842-SPM

FILED

MAY 07 2025

EXHIBIT D

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
E. ST. LOUIS OFFICE

**Plaintiff's Supplemental Motion to Include Guin Mundorf, LLC School Law Email Records in the Court Record
Investigation Findings Regarding Bullying Complaint of Minor Child, Daisey Luffman – Letter Dated April 8, 2025**

I. Overview

This exhibit concerns an internal investigation conducted by Principal Laura Bauer of Renfro Elementary School into a bullying complaint submitted on behalf of Plaintiff's daughter, Daisey Luffman, following her direct outcries to school staff about repeated physical harassment by another student. The investigation findings were delivered via letter dated April 8, 2025 and forwarded by Plaintiff to Guin Mundorf, LLC and other responsible parties for legal review.

II. Summary of Events and Findings

- The complaint arose not from Plaintiff, but directly from Daisey, who reported that another student had:
 - Pulled her hair
 - Shoved her to the ground
 - Pushed her into a puddle at recess

- **Despite Daisey reporting these events to multiple staff members, the district concluded the allegations were “unsubstantiated,” but paradoxically acknowledged that:**
 - **Corrective actions were taken**
 - **Staff were reminded of appropriate supervision**
 - **Supervisory aides were reminded about student support procedures**
 - **Additionally, Daisey was reportedly denied clean clothing after returning from recess soaked and distressed, which the school similarly dismissed as “unsubstantiated.”**
-

III. Legal and Procedural Concerns

1. Conflict of Interest and Investigative Bias

- **Principal Laura Bauer, who conducted this investigation, is currently the subject of federal and state investigations for:**
 - **Felony-level destruction and manipulation of education records**
 - **Unlawful conduct related to special education documentation**
- **This creates a clear conflict of interest and serious doubts about the legitimacy of the findings. She has a documented history of mishandling or deleting education records, which could include documentation related to this complaint.**

2. Lack of Trauma-Informed and Child-Centered Process

- **No documentation exists that shows:**
 - **Daisey was offered appropriate emotional support**
 - **A social worker or counselor was involved**
 - **A neutral third party interviewed her regarding the incidents**
- **Allowing a figure under multiple investigations to remain the lead factfinder in a complaint made by a minor child who is already at the center of the same administrator’s prior misconduct violates every standard of child protection and trauma-informed education practices.**

3. Procedural Due Process Failure

- **The district failed to:**
 - **Notify both legal guardians of all steps taken**
 - **Include objective third-party reviewers in the investigative process**
 - **Provide a clear chain of custody for any statements, incident reports, or internal findings that were used to reach the conclusion**
-

IV. Constitutional and Statutory Implications

Fourteenth Amendment – Procedural Due Process

- **By assigning an administrator under federal investigation to serve as judge and factfinder in a complaint involving the very same child, the district failed to provide a fair and unbiased review process, violating Plaintiff's and his daughter's constitutional rights.**

First Amendment – Right to Petition & Parental Advocacy

- **The district's reference to these being "the father's allegations" mischaracterizes Plaintiff's role. He simply relayed Daisey's own statements to the school and sought protection for her. Reframing this as "the father's complaint" is an attempt to discredit a parental advocate and shows institutional bias.**

Illinois School Code – Student Safety and Anti-Bullying Obligations

- **105 ILCS 5/27-23.7 requires school districts to investigate bullying thoroughly, fairly, and in a manner that protects the student from retaliation.**
- **The Code further expects the district to notify guardians, involve appropriate personnel (e.g., counselors), and act decisively when bullying is suspected.**
- **The denial of clean clothing and the failure to ensure psychological support violates both the spirit and letter of this law.**

Illinois Criminal Code – Official Misconduct (720 ILCS 5/33-3)

- **If Principal Bauer knowingly altered or suppressed facts during the investigation, or failed to report allegations in full, she could face criminal**

charges for failing to perform mandatory legal duties or for making misleading conclusions without transparency.

V. Formal Questions Submitted for Legal Review

In forwarding this investigation finding, Plaintiff submitted the following questions to Guin Mundorf, LLC and all appropriate district attorneys:

- 1. Can an administrator under federal investigation for falsifying or destroying education records be lawfully assigned to lead an internal investigation involving the same child?**
 - 2. Does your firm believe Bauer's findings can be treated as impartial? If not, should an outside, neutral investigator have been assigned?**
 - 3. Did your office review or approve Bauer's April 8, 2025 letter dismissing the bullying allegations?**
 - 4. Is it lawful or ethically acceptable under Illinois law and best practices to deny a wet and distressed child clean clothing after a reported incident of bullying, and then have that act dismissed without further investigation?**
 - 5. Can someone other than Principal Bauer handle any future interactions with Daisey, particularly for sensitive disclosures or follow-up conversations, in order to protect her emotional safety?**
-

VI. Legal and Practical Impact

This exhibit:

- Demonstrates ongoing retaliation and institutional failure to protect a child after she bravely disclosed serious incidents.**
 - Exposes systemic misconduct, lack of accountability, and a refusal to follow proper child-protection and investigative protocols.**
 - Highlights Plaintiff's reasonable and good-faith requests for transparency, accountability, and legally compliant investigations.**
-

VII. Relief Requested

Plaintiff respectfully requests the Court:

- 1. Accept Exhibit D into the official record.**
- 2. Consider it as evidence of:**
 - **Continuing violations of Plaintiff's and his daughter's constitutional rights.**
 - **Systemic bias, retaliation, and institutional failure to follow due process and statutory duties.**
- 3. Direct Defendants and their legal counsel to respond to the legal questions presented herein.**
- 4. Prevent any future investigation or disciplinary contact with Plaintiff's daughter from individuals currently under investigation for prior misconduct involving her.**

Respectfully Submitted,
Jeffrey Luffman, Pro Se Plaintiff
212 Camelot Dr.
Collinsville, IL 62234
(636) 675-4864
jeffrey.luffman@outlook.com

Executed this 7th day of May, 2025.



Collinsville Community Unit School District 10

201 West Clay Street • Collinsville, IL 62234 • 618-346-6350 • fax 618-343-3673

April 8, 2025

Via Regular Mail

**MR. JEFFREY LUFFMAN
212 CAMELOT DR
COLLINSVILLE IL 62234**

RE: Results of Investigation

Dear Mr. Luffman:

The District has investigated your complaint filed with Mrs. Bauer (Renfro Elementary School Principal) via Email on Thursday, April 3, 2025. In your correspondence you expressed concern regarding your daughter, Daisey being bullied by Student A as well as actions of staff members at Renfro Elementary School.

The District conducted an impartial, prompt, and thorough investigation into your allegations. As part of this investigation, the District interviewed Daisey, Student A and District staff. Specifically, you reported that:

1. Your daughter has shared with you that Student A has repeatedly targeted her with aggressive behavior. Specific incidents include having her hair pulled, being pushed from behind to the ground in the lunch line, and being shoved into a puddle during recess, resulting in wet clothes.

Finding/Response: Your complaint was determined to be unsubstantiated. There is no evidence that Student A has repeatedly targeted Daisey with aggressive behavior. When asked about reported aggressive behavior by Student A toward Daisey, Daisey responded that she was not aware of the conduct of Student A alleged by you toward her. When informed that you had Emailed Mrs. Bauer concerns about Student A bothering her, Daisy said, "I was trying to tell dad that we are friends now. He didn't let me finish my sentence. He was talking about another thing. He was talking about his enemies in the past and I couldn't tell him that me and (Student A) are friends now." When asked if she is afraid of Student A, Daisy responded, "No, she just annoyed me. We are friends now." Daisey stated that there are no problems with Student A at the present time and that they are friends. Daisy stated, "Now we play together. I want to be her friend. She is nice to me now. I am nice to her."

2. Your daughter told you that when she got wet, the recess aide accused her of intentionally going into the grass and denied her the opportunity to change clothes, further adding to her distress. According to your daughter, she reported these incidents multiple times a day to Miss P, Miss Rader and Mrs. Bauer.

Finding/Response: Your complaint is not substantiated. Daisey confirmed that she received new pants from the school nurse. She further confirmed that she informed Mrs. Rader about the incident *after* she received new pants.

Working Together To Develop a Caring School Community

4/4/25, 9:17 AM

Collinsville Unit 10 School District Mail - Fwd: Urgent Concern Regarding Bullying Incidents Involving My Daughter



Bradley Hyre <bhyre@cusd.kahoks.org>

Fwd: Urgent Concern Regarding Bullying Incidents Involving My Daughter

1 message

Laura Bauer <lbauer@cusd.kahoks.org>
To: Bradley Hyre <bhyre@cusd.kahoks.org>

4 April 2025 at 07:01

----- Forwarded message -----

From: Jeffrey Luffman <jeffrey.luffman@outlook.com>
Date: Thu, Apr 3, 2025 at 8:10 PM
Subject: Urgent Concern Regarding Bullying Incidents Involving My Daughter
To: Laura Bauer <lbauer@cusd.kahoks.org>, Brad Skertich <bskertich@cusd.kahoks.org>, Mark Foley <mfoley@cusd.kahoks.org>, Frank Leffler <fleffler@cusd.kahoks.org>, CPDFOIA <CPDFOIA@collinsvilleil.org>

Dear Principal Bauer,

I am writing to express my serious concern regarding multiple bullying incidents that my daughter has reported happening at school. She has shared with me that a student named Rocky has repeatedly targeted her with aggressive behavior. Specific incidents include having her hair pulled, being pushed from behind to the ground in the lunch line, and being shoved into a puddle during recess, resulting in wet clothes.

My daughter also mentioned that when she got wet, the recess aide accused her of intentionally going into the grass and denied her the opportunity to change clothes, further adding to her distress. According to my daughter, she has reported these incidents multiple times a day to Miss P, Miss Rader, and even to you, Principal Bauer.

I am deeply concerned that despite her efforts to speak up, she continues to face mistreatment without resolution. I would be extremely disappointed to learn that this ongoing issue is being neglected due to any existing tensions I may have with the school or district. Every student deserves a safe and respectful learning environment, and my daughter is no exception.

At this time, I am requesting the following:

1. A written statement detailing what actions have been taken in response to her reports of bullying.
2. Documentation of any investigations or disciplinary steps taken regarding the student involved.
3. A clear plan for how the school is ensuring my daughter's safety moving forward, including appropriate adult supervision and accountability.

Please consider this an official request for documentation under the Illinois School Code and all applicable federal education and civil rights laws. I expect a prompt and transparent response to these concerns.

Jeffrey Luffman

The District was also unable to substantiate that multiple reports per day of Student A harassing your daughter were reported to school officials.

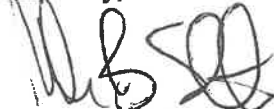
While there is not sufficient evidence as a result of our investigation to support that Student A has bullied Daisey, the District is taking the following remedial measures to prevent any future incidents from occurring:

- Mrs. Bauer and Mrs. Burgess, Principals at Renfro Elementary School, spoke with Daisey and Student A about the allegations. Student A has been instructed that she is never to engage in physical, inappropriate interactions with other students.
- The classroom instructors and recess supervisory staff have been notified of your allegations of student misconduct and have been reminded of student behavior expectations as outlined in board policy and the student and parent handbook.
- The District has provided resources regarding Social/Emotional and Emergency Resources as well as the informational flyer for the Southern Illinois Healthcare Foundation regarding health and behavioral services for district students.

I am also writing to let you know how seriously we take these types of matters at Collinsville School District. We do not tolerate any form of harassment in our District. The District strives to provide a safe environment for all students, free from harassment of any kind, which is reflected in the District's board policies and student handbook. Students are encouraged to promptly report claims or incidences of bullying, intimidation, harassment, sexual harassment, or any other prohibited conduct to any employee with whom the student is comfortable speaking. For your reference, please find enclosed Board Policies 2:260, 7:180, and 7:20.

Please do not hesitate to contact me if you have any questions concerning this matter.

Sincerely,



Dr. Mark B. Skertich
Superintendent
Collinsville CUSD10

CC: Mr. Bradley Hyre, Collinsville CUSD10 Assistant Superintendent of Schools
Mrs. Laura Bauer, Renfro Elementary School Principal
Mrs. Valerie Burgess, Renfro Elementary School Principal

Enclosures



Outlook

Re: Urgent Concern Regarding Bullying Incidents Involving My Daughter

From Jeffrey Luffman <jeffrey.luffman@outlook.com>

Date Tue 04/15/2025 7:50 PM

To bmundorf@gmschoollaw.com <bmundorf@gmschoollaw.com>; Dana Bond <dbond@gmschoollaw.com>; sguin@gmschoollaw.com <sguin@gmschoollaw.com>; cmundorf@gmschoollaw.com <cmundorf@gmschoollaw.com>; ehanses@gmschoollaw.com <ehanses@gmschoollaw.com>; amcdaniel@gmschoollaw.com <amcdaniel@gmschoollaw.com>; jbernard@gmschoollaw.com <jbernard@gmschoollaw.com>

Cc Laura Bauer <lbauer@cusd.kahoks.org>; Brad Skertich <bskertich@cusd.kahoks.org>; Mark Foley <mfoley@cusd.kahoks.org>; Frank Leffler <fleffler@cusd.kahoks.org>; CPDFOIA <CPDFOIA@collinsvilleil.org>

Bcc Senator Tammy Duckworth <correspondence@duckworth.senate.gov>; Criminal.Division@usdoj.gov <Criminal.Division@usdoj.gov>; Ethics <ethics.oeig@ilag.gov>; acortes@bnd.com <acortes@bnd.com>; information@iadc.org <information@iadc.org>

📎 1 attachment (4 MB)

School District Response to My bullying Complaint 15 Apr 2025.pdf;

I am forwarding the attached findings from the district's investigation into a bullying complaint submitted on behalf of my daughter, Daisey. This investigation was conducted by Principal Laura Bauer and reported in a letter dated **April 8, 2025**.

Key facts requiring urgent legal review:

1. The investigation was conducted solely by **Principal Laura Bauer**, despite her being **under federal and state investigation for felony-level official misconduct**, including destruction and manipulations of public records and unlawful conduct related to special education documentation.
2. **These were not my allegations.** This investigation was initiated after my daughter disclosed that another student **repeatedly pulled her hair, shoved her to the ground, and pushed her into a puddle** during recess. These outcries were made by Daisey herself to multiple school staff.
3. The district's response states that the complaint was deemed **"unsubstantiated,"** yet it also admits to **corrective measures being taken**, including reminders of appropriate behavior and supervisory guidance—an indication that **some level of concern was validated**.
4. The letter also acknowledges that Daisey was denied clean clothing by the recess aide after becoming wet and distressed, which was also deemed **"unsubstantiated"** despite her repeated reports.

This raises significant concerns about:

- **Bias** in the investigative process,
- **A lack of child-centered trauma-informed response**, and

- The **credibility and legality** of allowing an individual with pending investigations for official misconduct to serve as the lead factfinder in sensitive matters involving my child.

I am formally requesting a binding legal opinion on the following:

1. **Is it appropriate or lawful for an administrator currently under active state and federal investigation for misconduct, including record destruction and falsification, to lead an internal investigation into allegations affecting the same child whose educational records are the subject of that misconduct?**
2. **Does your firm believe Principal Bauer was capable of conducting an unbiased investigation, or should an impartial third party have been appointed to protect the integrity of the process and avoid conflicts of interest?**
3. **Was your office involved in reviewing, approving, or overseeing the response sent to me on April 8, 2025, regarding the bullying complaint?**
4. **Do you believe it is consistent with Illinois law and best practices in child welfare to deny a bullying victim clean clothing and then allow the administrator under review to declare the matter unsubstantiated without further intervention?**
5. **Can someone who is not under investigation for misconduct speak with my daughter at school moving forward, especially when it comes to sensitive disclosures?**

The report continually mentions the allegations by the father. These weren't my allegations. I was just relaying what my daughter told me.

Jeffrey Luffman
6366754864
jeffrey.luffman@outlook.com

From: Jeffrey Luffman <jeffrey.luffman@outlook.com>
Sent: Wednesday, April 9, 2025 5:14 AM
To: Laura Bauer <lbauer@cusd.kahoks.org>; Brad Skertich <bskertich@cusd.kahoks.org>; Mark Foley <mfoley@cusd.kahoks.org>; Frank Leffler <fleffler@cusd.kahoks.org>; CPDFOIA <CPDFOIA@collinsvilleil.org>
Cc: bmundorf@gmschoollaw.com <bmundorf@gmschoollaw.com>; Dana Bond <dbond@gmschoollaw.com>; sguin@gmschoollaw.com <sguin@gmschoollaw.com>; cmundorf@gmschoollaw.com <cmundorf@gmschoollaw.com>; ehanses@gmschoollaw.com <ehanses@gmschoollaw.com>; amcdaniel@gmschoollaw.com <amcdaniel@gmschoollaw.com>; jbernard@gmschoollaw.com <jbernard@gmschoollaw.com>; Michael Wesley <mwesley@michaelwesleylaw.com>; dfahrenkamp@gmail.com <dfahrenkamp@gmail.com>
Subject: Re: Urgent Concern Regarding Bullying Incidents Involving My Daughter

This is a follow up to my email asking to ensure my daughter was safe at school. When a child is repeatedly pushed from behind it creates a serious risk because there is no way for the child being attacked to prepare or brace for the fall.

My daughter mentioned Principal Bauer questioned her (my daughter) twice regarding the ongoing bullying on 4 April 2024. When I asked my daughter if things with her bully were better she said "same

Considering Principal Bauer's previous disregard for the law and her lack of a timely response to my urgent request for ensuring the safety of my daughter while she is at school, I think it is far more likely the administrators at the school are engaged in damage control rather than the safety of my daughter.

Who is ensuring the safety of my daughter?

Jeffrey Luffman
6366754864
jeffrey.luffman@outlook.com

From: Jeffrey Luffman <jeffrey.luffman@outlook.com>
Sent: Thursday, April 3, 2025 8:10 PM
To: Laura Bauer <lbauer@cusd.kahoks.org>; Brad Skertich <bskertich@cusd.kahoks.org>; Mark Foley <mfoley@cusd.kahoks.org>; Frank Leffler <fleffler@cusd.kahoks.org>; CPDFOIA <CPDFOIA@collinsvilleil.org>
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Jeffrey Luffman

6366754864

jeffrey.luffman@outlook.com